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**UNITED STATES BANKRUPTCY COURT FOR THE
EASTERN DISTRICT OF PENNSYLVANIA**

In re	JONATHAN ELDREDGE and	:	
	ERIN ELDREDGE	:	
	Debtor	:	Bankruptcy No.18-10887- elf
		:	Chapter 13

DEBTORS' OBJECTION TO CERTIFICATION OF DEFAULT OF STIPULATION

DEBTORS through counsel, hereby object to the Certification of default filed by creditor Pennsylvania Housing Finance Agency ("PHFA") on **12/21/20** and in support of this timely Objection thereto aver as follows:

1. The Certification makes the incomplete allegation that Debtors have not made payments in accord with a stipulation between debtor and PHFA without listing either the date of the Stipulation or the date of Order approving such stip.
2. Debtors have attempted to make all payments thereunder in a lump sum but Debtors have been unable to get the proper payment amount from creditor, possibly due to the closure of Offices of the Commonwealth due to COVID.
3. Debtors now HAVE the payoff figure of the stip, have funds to payoff the Stip and will be making such payment in full before any hearing on this matter.

Respectfully Submitted

/s/ Joseph F. Claffy

Attorney for Debtors